

[Submitting Counsel below]

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:  
  
ALL CASES

**ADMINISTRATIVE MOTION TO  
CONSIDER WHETHER ANOTHER  
PARTY'S MATERIAL SHOULD BE  
FILED UNDER SEAL**

Under Civil Local Rules 7-11 and 79-5(f), Plaintiffs move the Court to consider whether material designated confidential by Uber should be sealed.

Pursuant to Pretrial Order No. 8, the parties are filing a letter brief detailing their dispute regarding the production of Safety Lens snapshots in Defendant Fact Sheets. Exhibits to the letter brief have been designated as confidential by Uber.

**Material To Be Filed Under Seal**

The material to be filed under seal are exhibits to the parties' letter brief, which Uber has designated as confidential. Thus, Plaintiffs request the Court consider whether the following should be filed under seal:

Document	Description	Designating Party
Portions of Joint Letter Brief	Portions referring to and describing Exhibit 1 or 2	Uber
Portions of O'Connor Declaration	Parts of the O'Connor Declaration Uber requested be redacted	Uber
Exhibit 1	Uber-produced document bates stamped UBER-MDL3084-DFS00002727	Uber (and Plaintiffs) <sup>1</sup>

<sup>1</sup> Because Exhibit 1 contains plaintiff-specific personal information, as well as highly sensitive and private disclosures regarding incidents of sexual assaults, plaintiffs' move separately pursuant to Local Rule 79-5 to seal that exhibit.

Document	Description	Designating Party
Exhibit 2	Uber-produced document bates stamped UBER-MDL3084-00084720	Uber

Under Local Rule 79-5(f)(3), Uber bears the responsibility to establish that all of the designated material is sealable.

This motion complies with Civil Local Rule 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Andrew R. Kaufman in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

Dated: April 17, 2025

Respectfully submitted,

By: /s/ Sarah R. London

Sarah R. London (SBN 267093)

**GIRARD SHARP LLP**

601 California St., Suite 1400  
San Francisco, CA 94108  
Telephone: (415) 981-4800  
slondon@girardsharp.com

By: /s/ Rachel B. Abrams

Rachel B. Abrams (SBN 209316)

**PEIFFER WOLF CARR KANE  
CONWAY & WISE, LLP**

555 Montgomery Street, Suite 820  
San Francisco, CA 94111  
Telephone: (415) 426-5641  
Facsimile: (415) 840-9435  
rabrams@peifferwolf.com

By: /s/ Roopal P. Luhana

Roopal P. Luhana

**CHAFFIN LUHANA LLP**

600 Third Avenue, 12th Floor  
New York, NY 10016  
Telephone: (888) 480-1123  
Facsimile: (888) 499-1123  
luhana@chaffinluhana.com

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*Co-Lead Counsel for Plaintiffs*

**FILER'S ATTESTATION**

I am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I attest that the signatories above concurred in this filing.

Dated: April 17, 2025

By: /s/ Andrew R. Kaufman  
Andrew R. Kaufman